

REMARKS

The September 18, 2009 Office Action has been carefully reviewed and considered. Claims 1, 3, 8, 9, 13, 14, and 19-24 stand rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 6,157,538 (Ali). Claims 4, 5, 11, and 18 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Ali in view of Japanese Patent Publication No. 2001-118987. Applicant respectfully submits that all pending claims are in condition for immediate allowance.

Respectfully, Ali does to anticipate independent claims 1, 14, 23, and 24 because Ali does not disclose each and every element of Applicant's claimed invention. For example, Ali does not disclose connecting elements formed by recesses in a plastic injection-molded module housing enclosing said substrate regions, each recess extending from an exterior of the housing and being arranged between adjacent substrate regions. The Patent Office refers to the enclosure 11 shown in FIG. 4 of Ali for allegedly disclosing Applicant's module housing having recesses. However, FIG. 4 of Ali only partially shows enclosure 11. The complete enclosure 11 can be seen in FIG. 1A. Enclosure 11, shown in FIG. 1A, does not have a recess, much less a recess extending from an exterior of the enclosure and being arranged between adjacent substrate regions.

Additionally, Ali does not disclose connecting elements formed by recesses extending from an exterior of the housing and being arranged between adjacent substrate regions. In the rejection, the Patent Office identifies member 20 as allegedly being the claimed connecting element. However, FIG. 4 of Ali shows member 20 being arranged inside enclosure 11. One of ordinary skill would not understand the fully enclosed member 20 of Ali as being a connecting element formed by a recess extending from an exterior of the housing, as claimed.

With respect to the limitation "plastic injection-molded module housing", the Patent Office states that the expression would fail to structurally distinguish Applicant's claimed invention,

citing MPEP § 2113. Respectfully, the Examiner has misconstrued this section of the MPEP. MPEP § 2113 reads that product-by-process claims are not limited to the manipulations of the recited steps, only to the structure implied by the steps. Thus, the limitation “plastic injection-molded module housing” implies that the module housing is made of plastic. This limitation is absent in Ali and should not be neglected by the Patent Office.

In view of the remarks made herein, Applicant respectfully submits that the present application is in condition for immediate allowance. Action to such effect is respectfully requested. The Examiner is encouraged to contact Applicant’s attorney at (919) 854-1844 if any outstanding matters can be readily addressed by a phone call.

Respectfully submitted,
COATS & BENNETT, P.L.L.C.



Dated: December 3, 2009

George W. Alexander
Registration No.: 62,902

1400 Crescent Green, Suite 300
Cary, NC 27518

Telephone: (919) 854-1844
Facsimile: (919) 854-2084